

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

In re: William and Barbara Charles  
Debtor

Case No. 16-24015 CMB  
Chapter 13

Community Loan Servicing LLC f/k/a  
Bayview Loan Servicing, LLC  
Movant

v.  
William and Barbara Charles, Ronda J.  
Winnecour, Esq., Trustee  
Respondents

**DECLARATION OF DEBTORS IN RESPONSE TO**  
**NOTICE OF MORTGAGE PAYMENT CHANGE**

Debtors William and Barbara Charles, by their attorneys Catherine T. Martin and  
Neighborhood Legal Services Association, hereby state:

1. The debtors do not object to the proposed mortgage payment change.
2. The debtors' current plan payment is sufficient to fund the plan with the decreased escrow payment.

Respectfully submitted,

/s/Catherine T. Martin  
Attorney for Debtor/Movant  
Pa. I.D. #29049; Firm #213  
NLSA, 928 Penn Avenue, Pittsburgh, PA 15222  
(412) 586-6118; Email: [martinc@nlsa.us](mailto:martinc@nlsa.us)

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the Debtor's Declaration in response to Notice of Mortgage Payment Change on the following individuals by Notice of Electronic Filing, on the date stated below:

Lauren Moyer on behalf of creditor Community Loan Servicing, [LLC\\_ecfmail@ecf.courtdrive.com](mailto:LLC_ecfmail@ecf.courtdrive.com)

Ronda J. Winnecour, Chapter 13 Trustee  
[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

Office of the United States Trustee  
[ustpreion03.pi.ecf@usdoj.gov](mailto:ustpreion03.pi.ecf@usdoj.gov)

Date: 10/21/21

/s/ Catherine T. Martin  
Pa. I.D. No. 29049; Firm No. 213  
NEIGHBORHOOD LEGAL SERVICES  
ASSOCIATION  
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